

O S B O R N L A W, p.c.

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February 16, 2021

VIA ECF

MEMORANDUM ENDORSEMENT

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Garcia v. Commissioner of Social Security*,
Civil Action No. 1:20-cv-05066-JPC-GWG

Dear Judge Gorenstein,

We write on behalf of plaintiff, Maricela Garcia, and with the consent of the defendant, to request a 14-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion is due on February 18, 2021. Plaintiff respectfully requests an extension of time up to and including March 4, 2021. This is plaintiff's first request for an extension of time and it is respectfully requested so that the parties can engage in discussions regarding a voluntary remand of this case.

Honorable Gabriel W. Gorenstein
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Subject to the approval of the Court, the parties propose the following revised briefing schedule:

- a. Plaintiff to serve his motion for judgment on the pleadings on or before **March 4, 2021**;
- b. Defendant to serve its response/cross-motion on or before **May 3, 2021**; and
- c. Plaintiff to serve his reply (if any) on or before **May 24, 2021**.

Thank you for your consideration of this request.

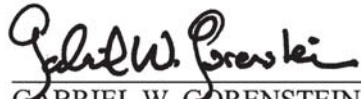
Respectfully submitted,

s/Daniel A. Osborn
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cc: Joseph Pantoja, Esq. (by ECF)

The proposed schedule is approved.

So Ordered.



GABRIEL W. GORENSTEIN
United States Magistrate Judge
February 17, 2021